



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

W. Simone Nicholson
Special Assistant Corporation Counsel
Office: (212) 356-7455

April 22, 2024

VIA ECF

The Honorable Colleen McMahon
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *A.G. v. N.Y.C. Dep't of Educ.* 24-1683 (CM)(GS)

Dear Judge McMahon

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, the Honorable Sylvia O. Hinds-Radix, attorney for Defendant in the matter referenced above, wherein Plaintiff seeks solely attorneys' fees, costs, and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act 20 U.S.C. §1400, *et. seq.* ("IDEA"), as well as for this action.

I write on behalf of all parties to request that the Initial Pretrial Conference ("IPC") scheduled for April 25, 2024 (ECF 5) be adjourned *sine die* and apologize to the Court for neglecting to seek this adjournment in our request for an extension of the answer deadline (ECF 8). This is a fees-only case therefore discovery will not be necessary, and the parties do not anticipate requiring Court assistance to reach a resolution. The parties have been able to successfully resolve every fees-only case commenced by Plaintiff's counsel and anticipate that this case will follow the same course.

Thank you for considering this submission.

Respectfully submitted,

Simone Nicholson

/s/ W. Simone Nicholson

Special Assistant Corporation Counsel

cc: Nicholas Apter-Vidler, Law Office of Elisa Hyman, *Counsel for Plaintiffs* (via ECF)

4/23/24
No conference have
needed. you have
90 days to
resolve, otherwise
make motion
to
summarize
judgment
Colleen McMahon